

EXHIBIT F

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Transcript of Sarah Wolff

Monday, May 2, 2022

National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.

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Reference Number: 115543

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2 UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 - - - - -

5 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
6 MARY WINTER, GENE STEINBERG, NANCY HART,
7 SARAH WOLFF, KAREN SLAVEN, KATE KENNEDY,
8 EDA DANIEL, and ANDREA SFERES,

9 Plaintiffs,

10 -and-

11 People of the STATE OF NEW YORK, by its attorney
12 general, LETITIA JAMES, ATTORNEY GENERAL OF THE
13 STATE OF NEW YORK,

14 Civil Action No.

15 -vs- 1:20-cv-08668-VM-OTW

16 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
17 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
18 ROBERT MAHANIAN, and JOHN and JANE DOES 1-10,

19 Defendants.
20 - - - - -

21 TRANSCRIPT of the stenographic notes of
22 the REMOTE VIDEOCONFERENCED deposition of SARAH
23 WOLFF in the above-entitled matter, as taken by and
24 before CHRISTINA COCHRAN, a Court Reporter and
25 Notary Public of the State of New York, held on May
2, 2022, commencing at 2:00 p.m., pursuant to
Notice.

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2 A P P E A R A N C E S:

3 (ALL APPEARANCES ARE VIA REMOTE VIDEOCONFERENCE

4 AND/OR TELEPHONE)

5

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22 ALSO PRESENT:

23 Marc Epstein, Esq., Attorney for Plaintiff

24 Franklin Monsour, Esq., Attorney for Plaintiff

25 Colleen Faherty, Office of The Attorney General

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2 testified to? I don't want to make you repeat
3 yourself.

4 A. No.

5 Q. Okay. Now, is it fair to say you saw
6 through the robocall?

7 A. What do you mean by "saw through"?

8 Q. You saw through what you are classifying
9 as an attempt to discourage voting by mail?

10 MS. ROEHRS: Objection.

11 A. If by "see through" you mean did I
12 recognize the mistruths in the robocall, then yes, I
13 did see through it.

14 Q. That is exactly what I meant, okay.

15 Now, at the time you received the
16 robocall, did you believe that black voters wouldn't
17 be able to recognize this alleged discouraging of
18 voting?

19 MS. ROEHRS: Objection.

20 A. I couldn't begin to say how black voters,
21 or anyone else other than myself, would perceive
22 this phone call.

23 Q. Well, you understand that is the basis of
24 your lawsuit, though, correct?

25 MS. ROEHRS: Objection.

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2 your understanding of what coerced means?

3 A. My understanding of coercion is being
4 pressured to do something because someone has some
5 kind of incentive to make you do that, something
6 that you don't want to do. No, I was not coerced by
7 this call.

8 Q. Do you believe the call was designed to
9 be coercive?

10 MS. ROEHRS: Objection.

11 A. I believe the call was likely intended to
12 discourage people from voting. I don't know if I
13 would call that coercion, but if you want to,
14 depending on your definition of coercion, could be.
15 If you are trying to push people to not do
16 something, then yeah, it's an attempt at coercion.

17 Q. Have you spoken to anyone in the black
18 community about this robocall?

19 A. Not specifically, no.

20 Q. So is it fair to say you don't know how
21 anyone in the black community would perceive this
22 robocall?

23 MS. ROEHRS: Objection.

24 A. I do not. I have not polled black people
25 on how they would feel about this call. All I know